

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**Re: Docket No. 1051**

**CERTIFICATION OF COUNSEL REGARDING DEBTORS’  
FIRST OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)  
(Reduced and Reclassified Claims, No Liability Claims, Reclassified Claims)**

The undersigned counsel to Plan Administrator in the above-captioned cases hereby certifies as follows:

1. On May 30, 2025, the *Debtors’ First Omnibus Objection to Certain Claims (Substantive) (Reduced and Reclassified Claims, No Liability Claims, Reclassified Claims)* [Docket No. 1051] (the “Objection”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the “Proposed Order”).

2. Pursuant to the notice of the Objection, the deadline to file responses to the Objection was June 20, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).

3. Prior to the Response Deadline, the Debtors received an informal response to the Objection and Proposed Order from Argo Partners, as current holder of Claim No. 13633 (originally filed by Natraj Home Furnishings Pvt Ltd.).

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

4. To resolve Argo's informal response, the Plan Administrator and counsel to Argo agreed to a revised Proposed Order, a copy of which is attached hereto as **Exhibit A** (the "**Revised Proposed Order**").

5. A redline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

6. The Plan Administrator respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

Dated: August 13, 2025  
Wilmington, Delaware

*/s/ Michael E. Fitzpatrick*

**COLE SCHOTZ P.C.**

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